



333 EARLE OVINGTON BOULEVARD, SUITE 402
UNIONDALE, NEW YORK 11553
T: 516-203-7600
F: 516-282-7878


MEMO ENDORSED

May 24, 2024

Via ECF

Hon. Edgardo Ramos
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

The application is X granted
_____ denied



Edgardo Ramos, U.S.D.J.
Dated: 05/28/2024
New York, New York

Re: *Daniel William McKnight v. African American Golfer's Digest, Inc.*
Case No: 1:23-cv-09611-ER

Dear Judge Ramos:

This firm represents plaintiff Daniel William McKnight ("Plaintiff") in the above-referenced matter and writes pursuant to Section 1.A of Your Honor's Individual Practices, to respectfully request leave to appear remotely (by telephone or video conference) at the hearing for the Order to Show Cause for Default Judgment, which is currently scheduled to be conducted in-person on May 30, 2024, at 11:45 am. [Dkt No. 18].

Specifically, Plaintiff respectfully submits that a remote appearance would limit the fees and expenses that have already been incurred in this case and the additional fees and expenses that would otherwise be incurred should a physical appearance be required for this hearing. This request is made in good faith and not for purposes of delay, no other dates will be impacted by this request, and granting this request will not prejudice any party to this matter. As Defendant remains in default in this matter, Defendant neither opposes nor consents to this request.

Thank you for your consideration.

Respectfully submitted,

SANDERS LAW GROUP

/s/ Jaymie Sabilia-Heffert
Jaymie Sabilia-Heffert